

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND

IN RE:

LUCAS A. SANO	:	BK NO. 14-11834
DORIS DE LOS SANTOS	:	Chapter 7
Debtors	:	

TRUSTEE'S OBJECTION TO DEBTOR'S EXEMPTION
OF 2010 FORD 350 SUPER DIESEL

Now comes Stacy B. Ferrara, the Trustee in the within matter, and hereby OBJECTS to the Debtor's exemption of his 2010 Ford 350 Super Diesel (the "Vehicle"). On December 3, 2014, the Debtors filed an Amended Schedule B scheduling the Vehicle titled to the Debtor, husband, and valuing the same at \$20,987.00. The Debtors also filed an Amended Schedule C seeking to exempt the Vehicle pursuant to 11 U.S.C. §522(d)(2) in the sum of \$1,350.00, and pursuant to 11 U.S.C. §522(d)(5) in the sum of \$14,432.31. While the undersigned has no objection to the Debtor, husband's exemption of the Vehicle pursuant to 11 U.S.C. §522(d)(2), the undersigned submits that the Debtor, husband's claimed "wild card" exemption is excessive as filed, and is limited to \$6,181.47.

WHEREFORE, the undersigned hereby OBJECTS to the Debtor, husband's exemption of his 2010 Ford 350 Super Diesel as referenced herein.

Respectfully submitted,
STACY B. FERRARA, TRUSTEE

/s/ Stacy B. Ferrara
STACY B. FERRARA, ESQ. #4344
Nolan, Brunero, Cronin & Ferrara, Ltd.
1070 Main Street
Coventry, RI 02816
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Dated: December 16, 2014

WITHIN FOURTEEN (14) DAYS AFTER SERVICE AS EVIDENCED BY THE CERTIFICATION, AND AN ADDITIONAL THREE (3) DAYS PURSUANT TO FED.R.BANK P.9006(f) IF YOU WERE SERVED BY MAIL, ANY PARTY AGAINST WHOM THIS PAPER HAS BEEN SERVED, OR ANY OTHER PARTY TO THE ACTION WHO OBJECTS TO THE RELIEF SOUGHT, SHALL SERVE AND FILE AN OBJECTION OR OTHER APPROPRIATE RESPONSE TO SAID PAPER WITH THE BANKRUPTCY COURT CLERK'S OFFICE, 380 WESTMINSTER MALL, 6TH FLOOR, PROVIDENCE, RI 02903, (401) 626-3100. IF NO OBJECTION OR OTHER RESPONSE IS TIMELY FILED, THE PAPER WILL BE DEEMED UNOPPOSED AND WILL BE GRANTED UNLESS:(1) THE REQUESTED RELIEF IS FORBIDDEN BY LAW;(2) THE REQUESTED RELIEF IS AGAINST PUBLIC POLICY; OR (3) IN THE OPINION OF THE COURT, THE INTEREST OF JUSTICE REQUIRES OTHERWISE.

ADMINISTRATIVE GENERAL ORDER-- FORM B

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Debtor(s)	:	

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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2014, I electronically filed Trustee's Objection to Debtor's Exemption of 2010 Ford 350 Super Diesel with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System. The following participants have received notice electronically: US Trustee, Jeffrey Dana, and Eva M. Massimino; and I hereby certify that I have mailed by United States Postal Service, postage pre-paid, the document and a copy of the Notice of Electronic Filing to the following non CM/ECF participants:

Lucas A. Sano
Doris De los Santos
59-61 Dewey Street
Providence, RI 02909

State of RI - Division of Taxation
RI Division of Taxation
Bankruptcy Unit
One Capitol Hill
Providence, RI 02908-5800

/s/Sherri-Lynn M. Faria